

EXHIBIT 20
Sept. 9, 2019 Letter from E.
Vandavelde to T. Prado
REDACTED VERSION

GIBSON DUNN

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September 9, 2019

VIA ELECTRONIC MAIL

Tania Prado
Morgan Lewis & Bockius LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1596

Re: Rimini's Objections and Response to Oracle's Supplemental Interrogatory No. 5

Dear Tania:

I write in response to your August 30, 2019 letter regarding Rimini's Objections and Response to Oracle's Supplemental Interrogatory No. 5.

Your letter contends that Rimini has failed to identify certain updates Rimini provided to its PeopleSoft and JD Edwards clients after November 5, 2018. As an initial matter, we note that Oracle now has access to Rimini's Jira system, [REDACTED]

[REDACTED] Indeed, Rimini relied on Jira to respond to Supplemental Interrogatory No. 5—and it appears that you have relied on the same source to write your letter. Aug. 30, 2019 Ltr. from T. Prado to E. Vandeveld at 1 (claiming that Rimini omitted from Exhibit D [REDACTED]). Nevertheless, Rimini supplemented its response to Interrogatory No. 5 on September 3, 2019 to address some of the issues raised in your letter. We further respond to your letter as follows.

First, you raised the issue that some updates from November 5, 2018 to January 1, 2019 were inadvertently omitted from Exhibit D. We determined this was due to a clerical error, and we corrected this issue in our supplemental response served the next business day after we received your letter. You also noted that Exhibit D did not include [REDACTED] despite the fact that the response to Interrogatory No. 5 stated that such information would be included in Exhibit D. As noted in our supplemental response, and as we stated during our September 3 meet and confer, this was also an error—Exhibit D did not contain that information, and it was not intended to. Our understanding is that [REDACTED]

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[REDACTED]

Second, you contend that “Rimini’s Exhibit D omits [REDACTED]
[REDACTED]” It was not our intention to omit [REDACTED]

Please provide more information so that we can investigate this issue, including a list of the purportedly omitted [REDACTED] and an explanation of how you identified them. We will look into this, and if any [REDACTED] were inadvertently omitted from our list, we will supplement our response to include them.¹

You also claim that Exhibit D failed to identify [REDACTED]

As you can see in Jira, [REDACTED]

Third, you contend that Exhibit D fails to provide information for updates to products other than PeopleSoft HRMS and JD Edwards Financials. We have investigated and determined that [REDACTED]

We will supplement Exhibit D-1 to make this addition. Otherwise, our understanding based on our investigation is that [REDACTED]

[REDACTED]. If you have some reason to believe that is incorrect, please provide us with the basis for your belief so we can investigate.

Fourth, you request that Rimini identify the “Persons who were involved in developing or testing the updates.” As you know, Rimini objected to this component of Oracle’s Supplemental Interrogatory No. 5 on the grounds that it is overbroad, unduly burdensome, vague, and ambiguous. Rimini maintains those objections. [REDACTED]
[REDACTED] Identifying each employee who was “involved in” (a term for which you provide no definition) developing or testing each update since November 5, 2018 would be a burdensome exercise, and would not provide you with any information about the

¹ You also note that Rimini’s response to Supplemental Interrogatory No. 5 does not contain “information related to Oracle Database and Siebel.” That is correct. Rimini objected to Supplemental Interrogatory No. 5 “to the extent it seeks information about Rimini’s support for Oracle software product lines not identified in Oracle’s June 28, 2019 letter, which discloses the conduct that Oracle believes ‘would violate Judge Hicks’s injunction if it continued after the injunction was effective.’” Rimini maintains that objection.

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content of Rimini's software updates. Your letter now argues, for the first time, that providing this information will "allow Oracle to evaluate whether Rimini's staffing is consistent or inconsistent with Rimini's stated position that it independently develops updates for each recipient." Aug. 30, 2019 Ltr. from T. Prado to E. Vandeveld at 2. To help us assess your argument, please clarify whether it is Oracle's contention that it is improper under the Injunction for the same Rimini software developer to develop an update for more than one recipient, and, if so, provide the basis for that contention.

Very truly yours,

A handwritten signature in blue ink, appearing to read "E. Vandeveld", with a stylized flourish at the end.

Eric D. Vandeveld

EDV/cjm

cc: Karen L. Dunn
Kathleen R. Hartnett
William Isaacson
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